

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IRON MOUNTAIN INCORPORATED;	)	
ct al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
THOMAS CARR,	)	
	)	
Defendant	)	
	)	Civil Action No.
And	)	
	)	
THOMAS CARR,	)	05 10890 RCL
	)	
Counter-Plaintiff	)	
	)	
v.	)	
	)	
IRON MOUNTAIN INCORPORATED;	)	
IRON MOUNTAIN INFORMATION	)	
MANAGEMENT, INC.; C. RICHARD	)	
REESE; JOHN F. KENNY, JR.; GARRY	)	
B. WATZKE; LARRY L. VARN; AND	)	
CHARLES G. MOORE,	)	
	)	
Counter-Defendants	)	

MOTION FOR ADMISSION *PRO HAC VICE* OF READ C. McCaffrey

Now comes Kathleen C. Stone, Esq., and hereby moves, pursuant to Local Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, for the admission *pro hac vice* of Read C. McCaffrey in the above-captioned action to appear and practice before this Court on behalf of the defendant and counterclaim plaintiff Thomas Carr. In support of this motion and based upon the

attached Affidavit of Read C. McCaffrey and representations made to me, the undersigned states as follows:

1. Read C. McCaffrey is a member of the law firm of Patton Boggs LLP, 2550 M Street, N.W., Suite 500, Washington, D.C. 20037-1350, telephone 202-457-5243, facsimile 202-457-6315.
2. Mr. McCaffrey is admitted to practice as a member of the Bar of the State of Maryland and the Bar of the District of Columbia, and he is a member in good standing admitted to practice before the Courts of Appeals for the Fourth Circuit, the Eleventh Circuit and the District of Columbia Circuit, before the United States District Courts for the District of Maryland and the District of Columbia and the Maryland State Courts and the District of Columbia Courts.
3. Mr. McCaffrey is not subject to pending disciplinary proceedings in any jurisdiction in which he has been admitted to practice, nor has he been denied admission or been disciplined by any court or administrative body.

WHEREFORE, the undersigned respectfully requests that this Court admit Read C. McCaffrey *pro hac vice* to appear and practice on behalf of the defendant and counterclaim plaintiff Thomas Carr.

Respectfully submitted,

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Kathleen C. Stone #481920  
Looney, Cohen, Reagan & Aisenberg LLP  
109 State Street  
Boston, MA 02109  
(617) 371-1050

May \_\_\_, 2005

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DISTRICT OF MASSACHUSETTS

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THOMAS CARR,	)	
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THOMAS CARR,	)	05 10890 RCL
	)	
Counter-Plaintiff	)	
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v.	)	
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IRON MOUNTAIN INCORPORATED;	)	
IRON MOUNTAIN INFORMATION	)	
MANAGEMENT, INC.; C. RICHARD	)	
REESE; JOHN F. KENNY, JR.; GARRY	)	
B. WATZKE; LARRY L. VARN; AND	)	
CHARLES G. MOORE,	)	
	)	
Counter-Defendants	)	

AFFIDAVIT OF READ C. McCaffrey  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

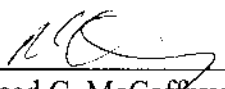
I, Read C. McCaffrey, being duly sworn, depose and state:

1. I am over the age of 18 years and am a resident of the State of Maryland.

2. I am a member of the law firm of Patton Boggs LLP, 2550 M Street,  
N.W., Suite 500, Washington, D.C. 20037-1350.

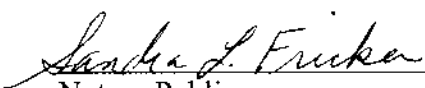
3. In support of the Motion for Admission *Pro Hac Vice* in the above-captioned case, I state that (a) I am a member of the bar in good standing in every jurisdiction(s) where I have been admitted to practice (Maryland and the District of Columbia); (b) I am not subject to any disciplinary proceedings as a member of the bar in any jurisdiction, nor have I been disciplined or denied admission by any court or administrative body; and (c) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Dated: May 20, 2005

  
Read C. McCaffrey

District of Columbia

On the 20<sup>th</sup> day of May 2005 before me, the undersigned notary public, personally appeared Read C. McCaffrey, proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed on the within instrument by [check one]:        photo identification;        credible witness; or ✓ personal knowledge, and acknowledged to me that he signed it voluntarily for its stated purpose.

  
Notary Public  
My commission expires: Aug. 31, 2009